

Exhibit A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This Document Relates To:  
  
Track Seven.

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Remote videotaped deposition of
G. CALEB ALEXANDER, M.D.

December 9, 2022
9:02 a.m.

Renee L. Pellegrino, RPR, CLR
(Appearing Remotely)

1 Q. I understand.

2 Now, you don't have an accounting
3 degree, correct?

4 A. That's correct.

5 Q. You don't have a finance degree,
6 correct?

7 A. Correct.

8 Q. All right. Would you agree that
9 public finance is a subfield of economics?

10 A. I don't -- I don't know details
11 about how the fields are sort of categorized
12 and the boundaries to them like I do in the
13 case of epidemiology and pharmacoepidemiology,
14 but it sounds plausible.

15 Q. Have you worked for a public
16 agency to provide budgets for governmental
17 agencies before?

18 A. No.

19 Q. Do you have a degree or training
20 in public administration?

21 A. No.

22 Q. Now, prior to this opioid
23 litigation experience for you, where you've
24 served as an expert throughout many cases,
25 have you ever served on a committee or a group

1 to develop a cost model to identify costs to
2 society for any other public health crisis or
3 issue?

4 A. No. I mean, that's not what I was
5 asked to do here either, so I think the answer
6 is no, I wasn't asked to. What I was asked to
7 do was to develop a report that describes at a
8 national level the evidence base underlying
9 efforts to abate harms arising from the opioid
10 epidemic.

11 Q. Okay. Now, it's my understanding
12 that the report that we have thus far with
13 respect to Montgomery County does not get into
14 the dollar signs of what it would cost to
15 abate any public nuisance in Montgomery
16 County, correct?

17 A. Yes, that's correct.

18 Q. All right. At some point in the
19 future, if asked by Plaintiff, do you intend
20 to or are you planning to or do you agree
21 to -- sorry if there was multiple questions
22 there, but is it your understanding that at
23 some point you may produce a report that
24 identifies actual costs, dollar signs to abate
25 the public nuisance in Montgomery County?

1 A. I think that would be unlikely. I
2 mean, typically that's not a function that
3 I've served in opioid litigation thus far.

4 Q. Maybe I didn't ask that question
5 correctly. It's my understanding in Track 3
6 you did identify dollar signs, costs to
7 actually abate the public nuisance in Track 3,
8 correct?

9 A. I may have provided select --
10 select costs of select programs or services,
11 but I did not -- I did not do an analysis that
12 tabulated across all of the programs and
13 services their costs and come up with a final
14 figure that was presented in the court.

15 Q. What was the second part of your
16 report in Track 3 then?

17 A. The second part was focused on how
18 to abate the opioid epidemic in these two
19 counties, in the two counties that were the
20 focus of Track 3.

21 Q. Okay. And you did provide some
22 costs for those programs, correct?

23 A. I mean, again, all of this
24 information is, if not in the public domain, I
25 presume you have access to it, and if you

1 have, you know, further questions on it, it
2 would be helpful for me to review the
3 materials with you, but -- but again, I may
4 have provided select costs for select programs
5 or services, but I was not -- typically the
6 vast majority of my effort was not focused on
7 the costs, rather that was provided by other
8 experts in the case.

9 Q. Understood. Okay.

10 Now, thus far in this Track 7
11 you've not looked at any documents specific to
12 Montgomery County; is that correct?

13 A. That's incorrect.

14 Q. Oh, I'm sorry. Have you reviewed
15 documents specific to Montgomery County in
16 preparing your Track 7 report?

17 A. Yes. I haven't looked at these
18 in -- with a -- a high level of detail or
19 scrutiny, but things such as the community
20 overdose action team's annual report is a
21 document that I've looked at.

22 Q. What I'd like to do is go off the
23 record. Dr. Alexander, if you would take a
24 moment while off record and review the
25 reliance materials and find within your